

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22-CR-430-JFH

**JUAN RANGEL-ORTIZ,
ELVIA TOMASA REYES,
a/k/a “Elvia T. Guillen-Reyes,”
BRANDON BRYAN LEE,
a/k/a “Sergio Antonio Diaz-
Gonzalez,”
CARLOS ALEXANDER
HERNANDEZ-RODRIGUEZ,
a/k/a “Alberto Rodriguez-Herrera,”
a/k/a “Carlos Alexander Rodriguez-
Herrera,”
JESSICA CHILDERS,
EMANUEL HARDIMAN,
DONNIE OWNBEY,
BRANDON DEWAYNE LEROY
AUSTIN,
AMBER BRUMMETT,
CAROL WATTS,
DAVID MILLER,
MICHAEL HELTON,
a/k/a “Angry Byrd,”
MICHAEL COLEMAN,
GARY STOTTLEMYRE,
JENNIFER WAGGONER,
ANTHONY BUMGARNER,**

Defendants,

**Government’s Notice of Intent to Introduce Testimony Pursuant to Rule
16(a)(1)(G) of the Federal Criminal Rules of Procedure**

The United States gives notice, pursuant to Federal Rule of Criminal Procedure

16(a)(1)(G), of its intent to introduce testimony at trial of expert witnesses who are forensic chemists. Under Federal Rules of Evidence 702, 703, and 705, the witnesses will testify consistent with Forensic Lab Reports of Analysis and Expert Opinions from their analysis of controlled substances seized through the course of the criminal investigation. The government has provided lab reports memorializing forensic analysis to the defense through discovery.

The government requests discovery pursuant to Rule 16(b) and (b)(1)(C)(i). The government reserves the right to supplement this notice as needed.

Respectfully submitted,

CLINTON J. JOHNSON
UNITED STATES ATTORNEY

/s/ Joel-lyn A. McCormick
JOEL-LYN A. McCORMICK, OBA #18240
Assistant United States Attorney
110 West 7th Street, Suite 300
Tulsa, Oklahoma 74119
(918) 382-2700

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of July 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a notice to all ECF recipients.

/s/ Joel-lyn A. McCormick
Joel-lyn A. McCormick